

# Nathan M. Hansen

Attorney at Law

2440 North Charles Street, Suite 242

North St. Paul, MN 55109

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April 3, 2019

VIA U.S. MAIL

Jay Bukstein

[REDACTED]  
St. Paul, MN 55103

Kimberly Bukstein

[REDACTED]  
St. Paul, MN 55103

**Re: Jay M. Bukstein, Kimberly S. Bukstein v. Michael Bernard Brodkorb  
Ramsey County Court File No. 62-HR-CV-19-252**

Dear Buksteins:

Enclosed and served upon you please find a motion pursuant to Minn. R. Civ. P. 11. Your Petition in the above-referenced matter is based upon lies and false police reports. Further, you have lied under oath on your Petition. These lies appear to me to be similar in nature to those made by Sandra Grazzini-Rucki in her frivolous HRO petition in Pinellas County, Florida.

Withdraw your request for a hearing or we will vigorously seek sanctions against you both, jointly and severally.

Please govern yourselves accordingly.

Sincerely,

  
Nathan M. Hansen

Enclosure: as stated.

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Enclosure: as stated.

- 3) Any such other relief of the Court deems appropriate, including but not limited to directives of a non-monetary nature or a fine payable to the Court, in addition to an award of attorneys' fees to the Respondent.

This motion is based upon all of the proceedings, the file, the accompanying memorandum of law.

Dated: April 3, 2019

/e/ Nathan M. Hansen

Nathan M. Hansen  
ATTORNEY FOR RESPONDENT  
Michael Brodkorb  
2440 North Charles Street, Ste 242  
North St. Paul, MN 55109  
651-704-9600  
651-704-9604 (fax)  
Attorney Reg. No. 0328017  


### **ACKNOWLEDGMENT**

The undersigned hereby acknowledges that sanctions may be imposed under the circumstances set forth in Minn. Stat. § 549.211.

Dated: April 3, 2019

/e/ Nathan M. Hansen

Nathan M. Hansen #0328017